

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**YUSEF SALAAM,
RAYMOND SANTANA,
KEVIN RICHARDSON
ANTRON BROWN,
And
KOREY WISE,**

Plaintiff,

v.

DONALD J. TRUMP,

Defendants.

Case No. 2:24-cv-05560-MMB

Declaration of Karin M. Sweigart

I, KARIN M. SWEIGART , declare as follows:

1. I am an attorney with the law firm Dhillon Law Group Inc. (“DLG”), counsel of record for President Donald J. Trump (“Defendant”). I am a member in good standing of the State Bar of Pennsylvania and have personal knowledge of the facts set forth in this Declaration and could and would testify competently to such facts under oath.

2. My firm was retained to represent President Trump in the above-captioned matter. Since being retained, I have been the attorney responsible for the work conducted on the motion to dismiss. I have assigned, supervised, and coordinated the work done on behalf of President Trump. I am familiar with all of DLG’s billing practices, and I have participated in the review and preparation of all billing statements by DLG to Defendant. I have specific personal knowledge concerning all attorneys’ fees and costs incurred on behalf of Defendant in connection with this action.

3. I attended Fordham University where I obtained my B.A. in Political Science and graduated in 2001 *cum laude*. I then attended the University of St. Thomas School of Law, from which I graduated *cum laude* in 2005. I am admitted to practice law in California, Pennsylvania, Missouri, the United States Supreme Court, the Ninth Circuit Court of Appeals, all federal districts in California, and the Middle and Eastern Districts of Pennsylvania.

4. I have extensive experience in matters pertaining to civil litigation, including First Amendment and other constitutional law issues, general and complex litigation, and civil rights and civil liberties issues. I am regularly called upon to litigate unique and novel legal issues across the nation. I have litigated landmark and high-profile defamation and anti-SLAPP cases in California, New York, Washington, D.C., Missouri, Texas, Georgia, Arizona, and Pennsylvania. My experience as an anti-SLAPP specialist and someone accustomed to litigating novel areas of the law made me particularly well suited to litigate this first test of Pennsylvania's anti-SLAPP in federal court.

5. Jacob Roth is an associate at Dhillon Law Group. He has an undergraduate degree in Russian literature from Northwestern University and is a 2019 graduate of the University of Virginia School of Law. His hourly rate is \$500 per hour.

6. Travis Yokoyama is a paralegal at Dhillon law Group with over ten years of experience. His hourly rate is \$300 per hour.

7. Amber Hulse is a law clerk with Dhillon Law Group. She is a 2024 graduate of Georgetown University Law Center. Her hourly rate is \$300 per hour.

8. Attached hereto as **Exhibit 1** are records reflecting the documentation of the hours charged in this matter, reduced in accord with standard billing judgment practices of this and other courts. Since President Trump's Motion to Dismiss was only partially granted, I

conservatively estimated the hours allocated to dismissed causes of action and heavily discounted the hours spent on activities spanning the entire complaint.

9. The total amount of time worked is listed below:

Motion to Dismiss – Defamation by Implication and IIED

- a. Counsel – 38.8 hours
- b. Associate –15.6 hours
- c. Paralegals – 21.6 hours
- d. Total: 76 hours

The total amount of attorneys’ fees Defendant incurred in connection with preparing and filing the motion is \$50,439.10. This totals reflect the above hours billed at the hourly rates discussed below.

10. My current hourly rate in 2025 is \$750. In connection with this motion in this case, I spent 38.8 hours. This time was spent on various tasks, including: correspondence regarding factual background and case strategy; discussion with co-counsel and law clerks regarding case strategy, civil procedure, factual, and research issues; discussion with opposing counsel regarding scheduling issues; and substantive review, revision, and research in relation to the motion papers we filed.

11. As a result of this action, DLG was forced to expend \$50,439.10 in attorneys’ fees in drafting, filing, and arguing the portions of the motion to dismiss related to the causes of action for Defamation by Implication and Intentional Infliction of Emotional Distress. This fees request is based on contemporaneous detailed time records. These fees are documented in detail in the billing records attached hereto as **Exhibit 1**. All of these fees were directly related to or inextricably intertwined with the filing of the anti-SLAPP motion related to the Defamation by

Implication and Intentional Infliction of Emotional Distress causes of action, other moving papers, or for argument related to the present Action. The attorneys' fees incurred herein are reasonable, and are charged by tenths of an hour increments, at our current rates.

12. In addition, the firm also incurred costs in the amount of \$2,828.46. These costs are itemized on the table attached as **Exhibit 2**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: April 24, 2025

Respectfully submitted,

By: /s/ Karin M. Sweigart
Karin M. Sweigart (PA No: 247462)
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Counsel for Defendants

EXHIBIT 1

Date	Hours	Description	Staff	Rate (\$)	% Discount	Request
10/21/2024	1.6	Strategized w/ co counsel re: approach to venue, choice of law, and substantive defenses; Reviewed Plaintiffs' complaint	Jacob Roth	500	66%	\$ 528.00
10/21/2024	0.7	Review complaint and call with co counsel regarding case strategy and timing.	Karin Sweigart	750	66%	\$ 346.50
10/29/2024	6.4	Research conflict of laws and application of anti-SLAPP in federal court.	Amber Hulse	300	0%	\$ 1,920.00
10/30/2024	2.5	Researched elements for IIED claims and substantive defenses	Jacob Roth	500	0%	\$ 1,250.00
10/29/2024	2.8	Research history and application of PA's new anti-SLAPP law and related correspondence with co counsel.	Karin Sweigart	750	0%	\$ 2,100.00
11/1/2024	0.8	Prepared memorandum re: substantive motion to dismiss arguments regarding IIED.	Jacob Roth	500	0%	\$ 400.00
11/12/2024	2.5	Prepared motion to dismiss re: substantive defenses to intentional infliction of emotional distress claims; Researched federal and PA law re: intentional infliction of emotional distress defenses of lack of outrageous conduct and lack of medically verified physical symptoms.	Jacob Roth	500	0%	\$ 1,250.00
11/12/2024	0.5	Call with co counsel regarding case strategy and drafting responsibilities.	Karin Sweigart	750	66%	\$ 247.50
11/13/2024	4.5	Continue to prepare motion to dismiss re: substantive defenses to intentional infliction of emotional distress claims; Researched federal and PA law re: intentional infliction of emotional distress defenses of lack of outrageous conduct and lack of medically verified physical symptoms.	Jacob Roth	500	0%	\$ 2,250.00
11/12/2024	1.5	Confer with HA regarding draft template of motion to dismiss. Review and analyze local rules and the Court's standing orders related to motions to dismiss requirements. Review and revise template of motion to dismiss. Confer with litigation team regarding findings related to local rules and requests for extensions of time.	Travis Yokoyama	300	0%	\$ 450.00
11/13/2024	5.3	Prepare stipulation of extension of time to respond to complaint. Research local rules and statutes regarding motions to dismiss and confer with KS regarding same. Review and prepare template for motion to recuse based upon correspondence from opposing counsel and confer with AH regarding same. Call to Court regarding page limit limitations. Review correspondence with opposing counsel regarding stipulation to extend time to respond to complaint. Review and revise motion to dismiss. Confer with opposing counsel regarding status of approval of extension of time to respond to complaint. Finalize and file stipulation for extension of time to respond to complaint. Review and prepare request for judicial notice and confer with JR regarding same.	Travis Yokoyama	300	0%	\$ 1,590.00
11/13/2024	0.8	Research rules governing procedures and related calls and correspondence with colleagues regarding local rules.	Karin Sweigart	750	0%	\$ 600.00
11/14/2024	3.4	Review Court's order regarding stipulation for extension of time to respond to Complaint and confer with litigation team regarding same. Review, revise, and finalize motion, memorandum, and declaration in support of motion for recusal. Review and analyze local rules regarding appearances before the Court.	Travis Yokoyama	300	0%	\$ 1,020.00
11/14/2024	1.9	Edit anti-SLAPP motion and related documents and correspond with colleagues re: the same; review email from court regarding extension.	Karin Sweigart	750	66%	\$ 940.50

Date	Hours	Description	Staff	Rate (\$)	% Discount	Request
11/18/2024	1.3	Review notice of reassignment and confer with litigation team. Review and analyze the reassigned judge's policies and procedures and confer with litigation team regarding information related to motions to dismiss. Review and analyze research regarding reassigned judge. Review and revise request for judicial notice.	Travis Yokoyama	300	0%	\$ 390.00
12/10/2024	4.2	Research and edit motion to dismiss brief and related papers.	Karin Sweigart	750	66%	\$ 2,079.00
12/11/2024	3.3	Edit and finalize motion to dismiss brief and notice of motion and conform to local rules.	Karin Sweigart	750	66%	\$ 1,633.50
12/10/2024	1.2	Review and revise motion to dismiss.	Travis Yokoyama	300	66%	\$ 237.60
12/11/2024	0.8	Research local rules and judge's procedures for motions to dismiss. Prepare notice of motion to dismiss. Finalize and file motion to dismiss. Confer with third-party to submit courtesy copy of motion to dismiss pursuant to the judge's procedures.	Travis Yokoyama	300	0%	\$ 240.00
12/19/2024	0.6	Review local rules and Court's policies and procedures regarding stipulations and continuances. Prepare stipulation to extend time to reply to opposition to motion to dismiss.	Travis Yokoyama	300	0%	\$ 180.00
12/19/2024	0.9	Review opposition and correspond with opposing counsel and staff to draft and finalize a stipulated agreement for extension to reply.	Karin Sweigart	750	66%	\$ 445.50
12/20/2024	0.2	Correspond with opposing counsel regarding signed stipulation and review Judge's rules for submission.	Karin Sweigart	750	0%	\$ 150.00
12/20/2024	0.6	Review and analyze the Court's policies and procedures regarding submissions of stipulations and proposed orders and confer with KS regarding same. Prepare correspondence to the Court submitting proposed order. Review order extending time to file reply in support of motion to dismiss and calendar same.	Travis Yokoyama	300	0%	\$ 180.00
1/2/2025	1.5	Reviewed and analyzed Plaintiffs' response in opposition to motion to dismiss; Strategized re: arguments for reply to opposition to motion to dismiss.	Jacob Roth	500	66%	\$ 495.00
1/2/2025	1.8	Review and research matters related to Plaintiffs' Opposition to Motion to Dismiss and related call with J. Roth.	Karin Sweigart	750	66%	\$ 891.00
1/3/2025	1	Strategy call with J. Roth regarding reply brief.	Karin Sweigart	750	66%	\$ 495.00
1/3/2025	4.2	Strategized w/ KS re: Reply to Plaintiffs' Opposition to Motion to Dismiss; Prepared Reply to Opposition to Motion to Dismiss re: defamation by implication; intentional infliction of emotional distress	Jacob Roth	500	66%	\$ 1,386.00
1/6/2025	5.4	Research anti-SLAPP circuit split and Third Circuit history of anti-SLAPP related decisions; draft section of reply brief re: Erie doctrine and applying Pennsylvania's anti-SLAPP in federal court; draft and send email regarding case strategy to client contacts.	Karin Sweigart	750	0%	\$ 4,050.00
1/7/2025	2.8	Prepared Reply to Opposition to Motion to Dismiss re: defamation by implication; intentional infliction of emotional distress	Jacob Roth	500	0%	\$ 1,400.00
1/8/2025	0.9	Final review of Reply brief and email T. Yokoyama with instructions re: filing.	Karin Sweigart	750	66%	\$ 445.50
1/10/2025	0.2	Review and respond to email request from proposed amici to support their motion to file a brief in support and related correspondence with co counsel.	Karin Sweigart	750	0%	\$ 150.00
1/8/2025	0.2	Finalize and file reply in support of motion to dismiss.	Travis Yokoyama	300	0%	\$ 60.00

Date	Hours	Description	Staff	Rate (\$)	% Discount	Request
3/13/2025	0.2	Review court's order setting oral argument and email colleagues regarding updating client.	Karin Sweigart	750	0%	\$ 150.00
3/13/2025	0.1	Review order setting hearing on motion to dismiss and calendar same.	Travis Yokoyama	300	0%	\$ 30.00
3/25/2025	1.5	Research prior intentional infliction of emotional distress decisions of Judge Beetlestone;	Karin Sweigart	750	0%	\$ 1,125.00
3/25/2025	1	Search for recent anti-SLAPP decisions in the Third Circuit.	Karin Sweigart	750	0%	\$ 750.00
3/25/2025	2.4	Review case briefing and begin creating hearing outline.	Karin Sweigart	750	66%	\$ 1,188.00
3/27/2025	2	Review case law and continue creating argument outline.	Karin Sweigart	750	66%	\$ 990.00
3/31/2025	7.7	Research cases cited by opposition in briefing; research prior decisions of the court in related matters; draft summaries of important cases; research and draft outline for oral argument.	Karin Sweigart	750	66%	\$ 3,811.50
4/1/2025	4.7	Review briefing and case materials; continue to refine outline.	Karin Sweigart	750	66%	\$ 2,326.50
4/2/2025	6	Continue to prepare for hearing and attend hearing; related follow up with colleagues regarding potential next steps.	Karin Sweigart	750	25%	\$ 1,125.00
3/28/2025	4.8	Continue researching related case law and drafting hearing outline.	Karin Sweigart	750	0%	\$ 3,600.00
4/10/2025	1.5	Review court's order and analyze potential options; related correspondence and calls with colleagues regarding case strategy.	Karin Sweigart	750	66%	\$ 742.50
4/17/2025	0.5	Draft email for client review regarding approval for case strategy.	Karin Sweigart	750	0%	\$ 375.00
4/24/2025	5.5	Prepare fees motion.	Karin Sweigart	750	0%	\$ 4,125.00
4/24/2025	1	Draft affidavit shells and prepare entries of costs; finalize and file motion.	Travis Yokoyama	300	0%	\$ 300.00
						\$ 50,439.10

EXHIBIT 2

Type	Date	Description	Billable (\$)	Discount	Fee
ExpenseEntry	10/24/24	Westlaw research.	\$2.06	66%	\$0.70
ExpenseEntry	10/23/24	Westlaw research.	\$0.64	66%	\$0.22
ExpenseEntry	10/24/24	Westlaw research.	\$4.28	66%	\$1.46
ExpenseEntry	10/28/24	Westlaw research.	\$7.50	66%	\$2.55
ExpenseEntry	10/29/24	Westlaw research.	\$4.07	66%	\$1.38
ExpenseEntry	10/30/24	Westlaw research.	\$8.79	66%	\$2.99
ExpenseEntry	10/21/24	Westlaw research.	\$3.43	66%	\$1.17
ExpenseEntry	10/22/24	Westlaw research.	\$25.08	66%	\$8.53
ExpenseEntry	10/23/24	Westlaw research.	\$24.42	66%	\$8.30
ExpenseEntry	10/27/24	Westlaw research.	\$21.42	66%	\$7.28
ExpenseEntry	10/28/24	Westlaw research.	\$22.40	66%	\$7.62
ExpenseEntry	10/29/24	Westlaw research.	\$14.36	66%	\$4.88
ExpenseEntry	10/30/24	Westlaw research.	\$15.21	66%	\$5.17
ExpenseEntry	10/21/24	Westlaw research.	\$30.36	66%	\$10.32
ExpenseEntry	10/27/24	Westlaw research.	\$42.83	66%	\$14.56
ExpenseEntry	10/28/24	Westlaw research.	\$125.64	66%	\$42.72
ExpenseEntry	10/29/24	Westlaw research.	\$196.02	66%	\$66.65
ExpenseEntry	10/30/24	Westlaw research.	\$105.05	66%	\$35.72
ExpenseEntry	10/31/24	Westlaw research.	\$63.48	66%	\$21.58
ExpenseEntry	11/13/24	Westlaw research.	\$3.86	66%	\$1.31
ExpenseEntry	11/12/24	Westlaw research.	\$39.02	66%	\$13.27
ExpenseEntry	11/13/24	Westlaw research.	\$31.69	66%	\$10.77
ExpenseEntry	11/25/24	Westlaw research.	\$14.98	66%	\$5.09
ExpenseEntry	11/26/24	Westlaw research.	\$5.56	66%	\$1.89
ExpenseEntry	11/1/24	Westlaw research.	\$222.24	66%	\$75.56
ExpenseEntry	11/12/24	Westlaw research.	\$182.92	66%	\$62.19
ExpenseEntry	11/13/24	Westlaw research.	\$474.14	66%	\$161.21
ExpenseEntry	11/19/24	Westlaw research.	\$28.37	66%	\$9.65
ExpenseEntry	11/20/24	Westlaw research.	\$31.92	66%	\$10.85
ExpenseEntry	11/25/24	Westlaw research.	\$148.77	66%	\$50.58
ExpenseEntry	11/13/24	Westlaw research.	\$17.16	66%	\$5.83
ExpenseEntry	11/19/24	Westlaw research.	\$5.30	66%	\$1.80
ExpenseEntry	12/4/24	Travel - Meals for Karin Sweigart	\$2.00	0%	\$2.00
ExpenseEntry	12/4/24	Travel - Meals for Karin Sweigart	\$16.60	0%	\$16.60
ExpenseEntry	12/4/24	Travel - Meals for Karin Sweigart	\$10.71	0%	\$10.71
ExpenseEntry	12/4/24	Travel - Meals for Karin Sweigart	\$6.41	0%	\$6.41
ExpenseEntry	12/4/24	Travel - Meals for Karin Sweigart	\$3.78	0%	\$3.78
ExpenseEntry	12/4/24	Travel - Meals for Karin Sweigart	\$6.00	0%	\$6.00
ExpenseEntry	12/4/24	Travel - Meals for Karin Sweigart	\$10.80	0%	\$10.80
ExpenseEntry	12/5/24	Travel - Meals for Karin Sweigart	\$17.82	0%	\$17.82
ExpenseEntry	12/5/24	Travel - Meals for Karin Sweigart	\$2.00	0%	\$2.00
ExpenseEntry	12/5/24	Travel - Lodging for Karin Sweigart	\$352.59	0%	\$352.59
ExpenseEntry	12/5/24	Travel - Meals for Karin Sweigart	\$12.95	0%	\$12.95
ExpenseEntry	12/5/24	Travel - Meals for Karin Sweigart	\$22.41	0%	\$22.41

ExpenseEntry	12/5/24	Travel - Ground for Karin Sweigart	\$36.70	0%	\$36.70
ExpenseEntry	12/6/24	Travel - Ground for Karin Sweigart	\$41.31	0%	\$41.31
ExpenseEntry	12/10/24	Westlaw research.	\$26.47	66%	\$9.00
ExpenseEntry	12/11/24	Westlaw research.	\$16.26	66%	\$5.53
ExpenseEntry	12/17/24	Westlaw research.	\$120.18	66%	\$40.86
ExpenseEntry	12/8/24	Westlaw research.	\$6.01	66%	\$2.04
ExpenseEntry	12/11/24	Westlaw research.	\$25.86	66%	\$8.79
ExpenseEntry	12/16/24	Re-qwest Inv #IRV 13626	\$64.57	66%	\$21.95
ExpenseEntry	1/2/25	Westlaw research.	\$130.10	66%	\$44.23
ExpenseEntry	1/3/25	Westlaw research.	\$1.66	66%	\$0.56
ExpenseEntry	1/6/25	Westlaw research.	\$165.13	66%	\$56.14
ExpenseEntry	1/8/25	Westlaw research.	\$1.66	66%	\$0.56
ExpenseEntry	1/16/25	Westlaw research.	\$12.14	66%	\$4.13
ExpenseEntry	1/23/25	Westlaw research.	\$132.96	66%	\$45.21
ExpenseEntry	1/2/25	Westlaw research.	\$13.97	66%	\$4.75
ExpenseEntry	1/3/25	Westlaw research.	\$19.77	66%	\$6.72
ExpenseEntry	1/6/25	Westlaw research.	\$362.53	66%	\$123.26
ExpenseEntry	1/7/25	Westlaw research.	\$122.40	66%	\$41.62
ExpenseEntry	3/25/25	FedEx print job for briefs.	\$24.72	66%	\$8.40
ExpenseEntry	3/25/25	Westlaw research.	\$119.86	66%	\$40.75
ExpenseEntry	3/26/25	Westlaw research.	\$148.53	66%	\$50.50
ExpenseEntry	3/31/25	Westlaw research.	\$31.84	66%	\$10.83
ExpenseEntry	3/19/25	Travel -Air for Karin Sweigart	\$656.96	0%	\$656.96
ExpenseEntry	3/28/25	Travel -Air for Karin Sweigart	\$240.00	0%	\$240.00
ExpenseEntry	4/1/25	Travel -Meals for Karin Sweigart	\$6.50	0%	\$6.50
ExpenseEntry	4/1/25	Travel -Lodging for Karin Sweigart	\$20.52	0%	\$20.52
ExpenseEntry	4/1/25	Travel -Meals for Karin Sweigart	\$19.95	0%	\$19.95
ExpenseEntry	4/2/25	Travel -Meals for Karin Sweigart	\$4.05	0%	\$4.05
ExpenseEntry	4/2/25	Travel -Meals for Karin Sweigart	\$13.75	0%	\$13.75
ExpenseEntry	4/2/25	Travel -Meals for Karin Sweigart	\$84.66	0%	\$84.66
ExpenseEntry	4/2/25	Travel -Meals for Karin Sweigart	\$10.70	0%	\$10.70
ExpenseEntry	4/2/25	Travel -Ground for Karin Sweigart	\$33.63	0%	\$33.63
ExpenseEntry	4/2/25	Travel -Meals for Karin Sweigart	\$6.00	0%	\$6.00
ExpenseEntry	4/3/25	Travel -Meals for Karin Sweigart	\$10.00	0%	\$10.00
		TOTAL	\$5,118.39		\$2,828.46